

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
DANIEL R. SCHIESS
Nevada Bar No. 5483
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: dan.schiess@usdoj.gov

Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PIERRE FRANCO-RAMOS,

Defendant.

Case No. 2:15-cr-00286-RFB-VCF

**STIPULATION TO CONTINUE
SENTENCING**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Daniel R. Schiess, Assistant United States Attorney, counsel for the United States of America, and Craig A. Mueller, Esq., counsel for defendant Pierre Franco-Ramos, that the sentencing currently scheduled for September 19, 2019, at the hour 2:00 p.m., be vacated and set to a date and time convenient to this Court, but no sooner than three weeks, and after 3 p.m. if convenient with the Court.

The Stipulation is entered into for the following reasons:

1 1. Counsel for Franco-Ramos has had difficulty opening the electronic version of the
2 Presentence Investigative Report and only recently was able to do so. He needs additional time
3 to review the report and review it with the defendant.

4 2. Counsel for the United States, AUSA Daniel R. Schiess, is currently in trial in
5 *United States v. Pastor Palafox et al*, 2:16-cr-00265-GMN. The trial is in session Monday through
6 Thursday from 9:00 a.m. – 3:00 p.m.

7 3. The defendant is not detained and does not object to the continuance.

8 4. The additional time requested herein is not sought for purposes of delay, but merely
9 to allow for Government to timely appear at the sentencing hearing, and to allow defense counsel
10 reasonable time to effectively prepare for the hearing, taking into account the exercise of due
11 diligence.

12 Respectfully submitted this 17th day of September, 2019.

13
14 NICHOLAS A. TRUTANICH
United States Attorney

15
16 /s/ Craig A. Mueller
CRAIG A. MUELLER, Esq.
Counsel for FRANCO-RAMOS

17 /s/ Daniel R. Schiess
DANIEL R. SCHIESS
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 PIERRE FRANCO-RAMOS,

7 Defendant.

Case No. 2:15-cr-00286-RFB-VCF

FINDINGS OF FACT,
CONCLUSIONS OF LAW AND
ORDER

8 FINDINGS OF FACT

9 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
10 Court finds that:

11 1. Counsel for Franco-Ramos has had difficulty opening the electronic version of the
12 Presentence Investigative Report and only recently was able to do so. He needs additional time
13 to review the report and review it with the defendant.

14 2. Counsel for the United States, AUSA Daniel R. Schiess, is currently in trial in
15 *United States v. Pastor Palafox et al*, 2:16-cr-00265-GMN. The trial is in session Monday through
16 Thursday from 9:00 a.m. – 3:00 p.m.

17 3. The defendant is not detained and does not object to the continuance. The parties
18 agree to the continuance.

19 4. The additional time requested herein is not sought for purposes of delay, but merely
20 to allow for continuity of counsel the Government, and to allow defense counsel reasonable time
21 to effectively prepare, taking into account the exercise of due diligence.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24

DATED this 18th day of September, 2019.



7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24